



Mark T. Power
A Member of the Firm

Direct Dial: (212) 478-7350
Email: mpower@hahnhausen.com

November 19, 2007

Via Hand Delivery

The Honorable Gerard E. Lynch
United States District Court Judge
United States District Court
Southern District New York
500 Pearl Street, Room 910
New York, NY 10007

Re: *Portland Natural Gas Transmission System, et al. v.*
Calpine Corporation, et al., Civil Case No. 07-09584 (GEL);
In re Calpine Corporation, et al., Bankruptcy Case No. 05-60200 (BRL)

Your Honor:

We are co-counsel to Movants Portland Natural Gas Transmission System and Gas Transmission Northwest Corporation (the “*Pipelines*”) in the above-referenced matter.

On October 23, 2007, the Pipelines filed their motion (the “*Motion*”) to withdraw the reference as to article V, section A.2, of the fourth amended plan of reorganization filed by the above-captioned debtors (the “*Debtors*”) and the Debtors’ limited objection to the claims filed by the Pipelines against the Debtors. The Motion was docketed and assigned to Your Honor on October 26, 2007 [Docket No. 1]. On November 9, 2007, the Debtors and their official committee of unsecured creditors (the “*Committee*”) filed opposition briefs with respect to the Motion (the “*Opposition Briefs*”) [Docket Nos. 4, 7 and 9].

On November 16, 2007, the Pipelines attempted to file a reply (the “*Reply*”) to the Opposition Briefs but were precluded from doing so by a service interruption with the Court’s ECF Service. Nonetheless, the Reply was served on the Debtors and the Committee on November 16, 2007 by email transmission and facsimile. Given the complexity of the issues involved, the Reply exceeds by eight (8) pages the ten (10) page limit for reply briefs under Your Honor’s Individual Practices, but still falls within the twenty-five (25) page reply limitation set forth in Rule 8010(c) of the Federal Rules of Bankruptcy Procedure. Additionally, we inadvertently omitted including a table of contents with our Reply. The Pipelines respectfully



November 19, 2007
Page 2

request Your Honor's permission, *nunc pro tunc* to November 16, 2007, to exceed the ten (10) page limitation set forth in Your Honor's Individual Practices by eight (8) pages and to dispense with the table of contents requirement in this instance. We apologize for not seeking Your Honor's permission prior to our submission of the Reply.

Thank you for your consideration of this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Mark T. Power', with a long, sweeping horizontal stroke at the end.

Mark T. Power

cc: Mark E. McKane
Lisa G. Beckerman
Edward Sassower
Richard Cieri
David R. Seligman
Marc Kieselstein
James J. Mazza, Jr.
Paul Schwartzberg
Steven B. Levine
Alan W. Kornberg
Andrew N. Rosenberg
Elizabeth R. McColm
Michael S. Stamer
Philip C. Dublin
Alexis Freeman
Gary L. Kaplan
Peter V. Pantaleo
David J. Mack
Robert Johnson
Ken Davis